

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHARIF STINSON, MARIAM FARNUM, CHARLEAN
FINLEY, RYBURN WALKES, JAMEL TOWE,
CHRISTIAN DUDLEY, JOCELEY FERDINAND, GARY
SHAW, MICHAEL BENNETT, CHANEL MEAUSA,
DAVID THOMPSON, JULIUS DIXON, JOSEPH
SARPONG, JEREMY THAMES, SEAN PETTIGREW,
LEANDER GRIFFIN, BRIAN MORRIS, MICA
ANCRUM, RICARDO JONES, VICTOR BRELAND,
LINDSEY RIDDICK and MICHAEL RIDDICK, on behalf
of Themselves and Other Similarly Situated,

NOTICE OF MOTION

10 Civ. 4228 (RWS)

Plaintiffs,

-against-

THE CITY OF NEW YORK, RAYMOND KELLY,
Commissioner of the New York City Police Department,
Individually and in his Official Capacity, and P.O.s "JOHN
DOE" #1-50, Individually and in their Official Capacities,
(the name John Doe being fictitious, as the true names are
presently unknown),

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying memorandum of law, dated February 12, 2016, and all pleadings and proceedings previously had herein, defendants City of New York and Raymond Kelly will move this Court before the Honorable Robert W. Sweet, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007 at a date and time to be determined by the Court, for a Protective Order Pursuant to Fed. R. Civ. P. 26(c) limiting the scope of the March 11, 2015 Rule 30(b)(6) Notice of Deposition, and for such other and further relief as the Court deems just, proper and equitable.

PLEASE TAKE FURTHER NOTICE that pursuant to the Local Rules, plaintiffs' opposition papers, if any, are due on or before February 18, 2016, and defendants reply papers, if any, are due by February 22, 2016.

Dated: New York, New York
February 12, 2016

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By:



Suzanna Publicker Mettham
Senior Counsel